

3682

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

**OLLIE GREENE, Individually as the
surviving parent of WYNDELL GREENE,
SR., WILLIAM GREENE, as the
Administrator of the Estate of WYNDELL
GREENE, SR., and MARILYN BURDETTE
HARDEMAN, Individually and as the
surviving parent of LAKEYSHA GREENE,**

Plaintiffs,
v.

**TOYOTA MOTOR CORPORATION,
TOYOTA MOTOR ENGINEERING &
MANUFACTURING NORTH AMERICA,
INC., TOYOTA MOTOR SALES USA,
INC., VOLVO GROUP NORTH
AMERICA, LLC., VOLVO TRUCKS
NORTH AMERICA, A DIVISION OF
VOLVO GROUP NORTH AMERICA,
LLC., STRICK TRAILERS, LLC, JOHN
FAYARD MOVING & WAREHOUSE,
LLC, and DOLPHIN LINE, INC.**

Defendants.

**CAUSE NUMBER: 3:11-cv-0207-N
JURY TRIAL DEMANDED**

**DEFENDANT JOHN FAYARD MOVING & WAREHOUSE, LLC'S
NOTICE OF SERVICE OF EXPERT DISCLOSURES**

TO: Plaintiffs **OLLIE GREENE, WILLIAM GREENE, and MARILYN HARDEMAN**, by and through their attorneys of record, Aubrey "Nick" Pittman, The Pittman Law Firm PC, 100 Crescent Court, Suite 700, Dallas, Texas, 75201-2112, and Daryl K. Washington, Law offices of Daryl K. Washington, P.C., 325 N. St. Paul, Suite 1975, Dallas, Texas, 75201.

Defendant, JOHN FAYARD MOVING & WAREHOUSE, LLC, pursuant to Federal Rule of

Civil Procedure 26(a)(2)(A) and 26(A)(2)(B), have disclosed the identities and served upon counsel of record the written reports and *curriculum vitae* of the following expert witnesses:

I.
RETAINED EXPERTS

- A. Thomas Truss
7979 Scasta Road
Bryan, Texas 77808
979-589-1595
- B. Lee Carr
Carr Engineering, Inc.
12500 Castlebridge Drive
Houston, Texas 77065-4532
281-894-8955
- C. Helen Reynolds, Ph.D.
Ruhter & Reynolds
3625 North Hall Street, Ste. 750
Dallas, Texas 75219
214-219-8100

II.
NON-RETAINED EXPERTS

- A. Texas Department of Public Safety (DPS)/Texas Highway Patrol (THP) troopers:
Dexter Barkley
Christopher Countryman
Clint Baughman
Albert Cummins
111 Tejas Drive
Terrell, Texas 75160
(972) 551-6050
- B. Dallas County Medical Examiner's Office forensic pathologists:
Tracey Dyer, M.D.
Chester Gwin, M.D.
Lynn Salzberger, M.D.
Southwestern Institute of Forensic Science at Dallas
2355 North Stemmons Freeway
Dallas, Texas 75207
214-920-5900

C. Gary Hatfield
Dolphin Line, Inc.
4521 Higgins Road
Mobile, Alabama 36619
251-666-2057

III.
CROSS-DESIGNATION

Fayard Moving designates and incorporates by reference all experts designated by any defendant to this suit, even if the designating party is not a party to the suit at the time of trial. In the event a defendant designates an expert but then is dismissed for any reason from the suit or fails to call any designated expert, Fayard Moving reserves the right to designate and/or call any party and/or any of its designated experts. However, in making the foregoing designations and reservations, Fayard Moving does not necessarily accept, recognize, adopt, agree with, or validate any opinions disclosed, made, or offered by such experts and is not waiving its right to challenge the qualifications or opinions of such experts.

Respectfully submitted,

/s/ Scott W. Self
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**ATTORNEYS FOR DEFENDANT
JOHN FAYARD MOVING
& WAREHOUSE, LLC**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above and foregoing document has been served upon all counsel of record pursuant to local rules on this the 20TH day of December, 2013, in the manner shown below:

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/s/ Scott W. Self

SCOTT W. SELF